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*Attorneys for Defendants Lam Sin
Yam, Ray Lim, Tiffany Ngo
individually and as a trustee of the
Tiffany Ngo Living Trust UTD, and
Ngo Asset Management, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Socheat Chy,

Plaintiff,

v.

Sing Lim; Ray Lim; Tiffany Ngo;
Ngo Asset Management, LLC;
Tiffany Ngo in her capacity as
trustee of the Tiffany Ngo Living
Trust UTD; Naing Lam Yam; Jane
Doe 1; Cindy Kanya Chan; Molica
Ratha Keo; Nivodeth Khiev;
Defendant Doe Gas Station 2;
Defendant Doe Gas Station 3;
Defendant Doe Laundromat 4; and
DOES 5 through 10, inclusive,

Defendants.

Case No. 2:17-cv-04325

**DECLARATION OF HEIDI STILB
LEWIS IN SUPPORT OF JOINT
STIPULATION TO EXTEND TIME
TO RESPOND TO THE FIRST
AMENDED COMPLAINT AS TO
DEFENDANTS LAM SIN YAM; RAY
LIM; TIFFANY NGO; TIFFANY
NGO IN HER CAPACITY AS
TRUSTEE OF THE TIFFANY NGO
LIVING TRUST; AND NGO ASSET
MANAGEMENT, LLC**

Complaint served: June 19, 2017
First Amended Complaint served:
August 16, 2017
Current response date: August 30, 2017
New response date: September 7, 2017

DECLARATION OF HEIDI STILB LEWIS

I, HEIDI STILB LEWIS, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the
State of California and an attorney of the law firm of Sullivan, Krieger, Truong,

1 Spagnola & Klausner, LLP, counsel of record herein for Defendants LAM SIN YAM
2 (named in the Complaint as Defendant “SING LIM”), RAY LIM, TIFFANY NGO,
3 TIFFANY NGO IN HER CAPACITY AS TRUSTEE OF THE TIFFANY NGO
4 LIVING TRUST, and NGO ASSET MANAGEMENT, LLC (collectively,
5 “Defendants”). I have personal knowledge of the following facts, and if called and
6 sworn as a witness, I could and would competently testify thereto.

7 2. Plaintiff SOCHEAT CHY (“Plaintiff”) served Defendants with the
8 Complaint on June 19, 2017. Defendants’ responsive pleading or motion to dismiss the
9 Complaint was initially due on July 10, 2017. Plaintiff and Defendants jointly
10 stipulated on June 30, 2017 to a 30-day extension for Defendants to file responsive
11 pleadings or a motion to dismiss the Complaint, due on August 9, 2017.

12 3. Defendants’ responsive pleading or motion to dismiss the Complaint was
13 due on August 9, 2017.

14 4. On August 8, 2017, this Court granted Defendants an extension to and
15 including August 16, 2017, to respond to the complaint.

16 5. On August 16, 2017, Plaintiff filed a First Amended Complaint.

17 6. Defendants’ response to the First Amended Complaint was due on August
18 30, 2017.

19 7. On August 30, 2017, the parties engaged in a Local Rule 7-3 meet and
20 confer conference regarding Plaintiff’s desire to file a Second Amended Complaint,
21 alleging a claim for Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18
22 U.S.C. § 1961 *et seq.*, against Defendants and certain Doe Defendants, and Defendants
23 request for an extension to respond to the First Amended Complaint.

24 8. As a result of the meet and confer conference, the parties agreed to
25 stipulate to Plaintiff’s filing the proposed Second Amended Complaint on or before
26 September 5, 2017, without waiver of Defendants’ right to file responsive pleadings
27 and/or motion to strike and/or motion to dismiss in response thereto.

1 9. As a further result of the meet and confer, the parties agreed that
 2 Defendants shall have an extension to and including September 7, 2017, to file
 3 responsive pleadings and/or motion to strike and/or motion to dismiss the First
 4 Amended Complaint, which will be unnecessary if Plaintiff files a Second Amended
 5 Complaint on September 5, 2017.

6 10. Counsel respectfully submit that the facts set forth above constitute good
 7 for this Court to approve the JOINT STIPULATION TO EXTEND TIME TO
 8 RESPOND TO THE FIRST AMENDED COMPLAINT AS TO DEFENDANTS LAM
 9 SIN YAM; RAY LIM; TIFFANY NGO; TIFFANY NGO IN HER CAPACITY AS
 10 TRUSTEE OF THE TIFFANY NGO LIVING TRUST; AND NGO ASSET
 11 MANAGEMENT, LLC, submitted concurrently with this Declaration.

12
 13 I declare under penalty of perjury under the laws of the State of California and
 14 the United States of America that the foregoing is true and correct. Executed this
 15 thirtieth day of August 2017, at Irvine, California.

16
 17 /s/Heidi Stilb Lewis

HEIDI STILB LEWIS

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 26 Tiffany Ngo individually and as a trustee of the
 27 Tiffany Ngo Living Trust UTD, and Ngo Asset
 28 Management, LLC